

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA.

CASE NO: 00-6309-CR-SEITZ

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JULIUS BRUCE CHIUSANO,

Defendant.

MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and moves this Honorable Court for the entry of an order terminating his supervised release on an early basis, and would show unto the Court as follows:

1. That on November 15, 2001, the Defendant was sentenced to a period of eighteen (18) months followed by three (3) years supervised release on Count 6 of the Indictment in the instant case, to-wit: Conspiracy to Commit Money Laundering.
2. That the Defendant has completed his period of incarceration and was released to a half-way house on February 22, 2003.
3. That the Defendant while in custody successfully completed 500 hours in the drug and alcohol rehabilitation program.
4. That the Defendant was released on August 22, 2003 from the halfway house without any incident.
5. That the Defendant has been supervised by Anthony Gagliardi, United States Parole Officer, United States Probation, 299 East Broward Boulevard, Fort Lauderdale, Florida 33301.
6. That undersigned counsel has contacted Mr. Gagliardi, United States Parole Officer, who has stated that the Defendant has completed all of the special conditions of supervised release including completion of 250 hours of community service; maintenance of steady employment and residency, and is otherwise in compliance with this Honorable Court's

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requirements .

7. That the Defendant has been out of federal prison for over two (2) years and has complied with all special conditions of probation without incident, it is respectfully requested that this Honorable Court enter an order early terminating the remaining term of supervised release.

WHEREFORE, based upon the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel respectfully requests this Honorable Court enter an order terminating the Defendant's remaining term of supervised release.

10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has contacted the opposing counsel, Assistant United States Attorney, Brian McCormick, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter, however Mr. McCormick did not express his position to the granting of this motion.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Brian McCormick, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and U.S. Mail, and Anthony Gagliardi, United States Parole Officer, United States Probation, 299 East Broward Boulevard, Fort Lauderdale, Florida 33301, by U.S. Mail Delivery; and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 21 MARCH, 2005.

Respectfully submitted,

DONALD R. SPADARO, P.A.
Attorneys for DEFENDANT/CHIUSANO
1000 South Federal Highway
Suite 103
Fort Lauderdale, Florida 33316
Telephone: (954) 763-5504

By: 

DONALD R. SPADARO, ESQUIRE
Florida Bar No.: 320341